

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE DIDI GLOBAL INC. SECURITIES  
LITIGATION

Master Docket 1:21-cv-05807-LAK-VF

This Document Relates To: All Actions

**STIPULATION AND [PROPOSED] ORDER REGARDING  
ADDITIONAL CLASS CERTIFICATION BRIEFING**

WHEREAS, on January 6, 2025, Plaintiffs filed a Motion for Class Certification (ECF No. 261; the “Motion”) and a memorandum of law in support (ECF No. 264, the “Opening Brief”);

WHEREAS, on January 23, 2025, Judge Kaplan issued an Amended Order of Reference to a Magistrate Judge referring the Motion to Judge Figueredo (ECF No. 280);

WHEREAS, on March 7, 2025, Defendants opposed the Motion (ECF No. 323);

WHEREAS, on April 9, 2025, Plaintiffs filed a reply in further support of the Motion (ECF No. 345, the “Reply”);

WHEREAS, Plaintiffs made arguments in the Reply regarding the effect of the Underwriter Defendants’ stabilizing transactions during the class period not raised in the Opening Brief, and submitted a new expert report regarding the same by Professor Rajesh Aggarwal (ECF No. 345-2);

WHEREAS, on April 16, 2025, counsel for Plaintiffs and Defendant DiDi Global Inc. (“DiDi”) met and conferred regarding the submission of additional briefing regarding Plaintiffs’ argument on the effect of the stabilizing transactions;

WHEREAS, on the same date, Plaintiffs notified DiDi of their intention to serve a corrected expert report by Professor Aggarwal and an amended Reply to correct an error;

WHEREAS, On April 16, 2025, Plaintiffs served on Defendants the amended Reply brief and the corrected declaration by Professor Aggarwal, dated April 16, 2025; and

WHEREAS, Plaintiffs and Defendants consent to this stipulation.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that:

(1) no later than one business day following the entry of an order approving this stipulation, Plaintiffs may file the amended Reply brief and the corrected declaration by Professor Aggarwal;

(2) no later than May 19, 2025, Defendants may file a sur-reply limited to addressing the arguments made by Plaintiffs regarding the effect of stabilizing transactions, not to exceed three pages, and an expert report regarding the stabilizing transactions; and

(3) no later than June 9, 2025, Plaintiffs may file a sur-sur-reply, not to exceed three pages, limited to responding to the arguments made by Defendants in their sur-reply, and an expert report responding to any expert report Defendants attach to their sur-reply.

Respectfully submitted,

Dated: April 17, 2025

/s/ Corey Worcester

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*Counsel for Defendant DiDi Global Inc.*

**SO ORDERED.**

DATED: \_\_\_\_\_

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Hon. Valerie Figueredo, U.S. Magistrate Judge